

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: cbssc@dgs.ca.gov

Office Use Item No. _____

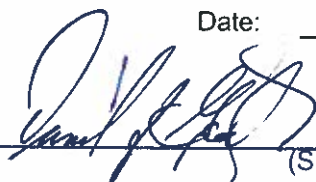
PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 26, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: DECEMBER 10, 2012

Date: 12/5/2012

From:

Daniel J. Bartz
Name (Print or type)


(Signature)

Kohler Co. – Staff Analyst, Codes & Standards Department

Agency, jurisdiction, chapter, company, association, individual, etc.

444 Highland Drive
Street

Kohler
City

Wisconsin
State

53044
Zip

We do not agree with:

☒ The Agency proposed modifications As Submitted on Section No. 11B-604.3.1 Size.

and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☐ Approved as Amended

Suggested Revisions to the Text of the Regulations:

We recommend disapproval of this proposal and adoption of the 2010 ADA Standards in efforts of harmonization.

Reason:

We see the proposed addition for the 60" x 48" maneuvering space located from the front of the toilet as a requirement that will cause confusion for building authorities and building owners in the field. There are many different sizes of accessible toilets available in the market place. This change if approved would deviate from the installation of standard size stalls and necessitate use and installation of customized stall sizes, which in turn will create significant variations in room sizes. In addition, this proposal if adopted would inadvertently prevent currently accepted high quality toilets from being installed which are equally as good as others.

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We do not agree with:

☒ The Agency proposed modifications As Submitted on Section No. 11B-608.7 Exception

and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☐ Approved as Amended

Suggested Revisions to the Text of the Regulations:

We recommend disapproval of this proposal and adoption of the 2010 ADA Standards in efforts of harmonization.

Reason:

We strongly recommend the DSA re-consider allowing the exception for 2" Transfer Shower thresholds for installations that are renovations in older buildings. This allows the building authorities having jurisdiction and architects, the latitude to determine whether or not the floor structure of a building would be compromised to an unsafe floor load bearing condition, if the floor joists had to be notched out to allow the ½" threshold height for an accessible shower.

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We do not agree with:

☒ The Agency proposed modifications As Submitted on Section No. 11B-608.3.1 – Transfer Showers

and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☐ Approved as Amended

Suggested Revisions to the Text of the Regulations:

We recommend disapproval of this proposal and adoption of the 2010 ADA Standards in efforts of harmonization. We also recommend all stricken language pertaining to transfer showers be restored in sections 11B 608.4 and the exception, 11B608.5.1, Figure 608.5.1, and section 608.5.2.

Reason:


We recommend that the DSA and the CBC re-consider the adoption of the entire Section 608 Showers, to include all subsections pertaining to Transfer Showers for two reasons: 1.) To create harmony ADA 2010 Standards and; 2.) to provide the disabled community with more choices for greater accessibility, i.e. an additional option for showering. Many disabled people do not own showering type wheel chairs. Many do not travel with showering type wheel chairs. Allowing Transfer showers provides an alternative option for them.

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444 Highland Drive Kohler Wisconsin 53044
Street City State Zip

We (do) agree with:

☒ The Agency proposed modifications As Submitted on Section No. 11B-604.5.2 Rear wall & Exceptions 1&2

and request that this section or reference provision be recommended:

☒ Approved ☐ Disapproved ☐ Held for Further Study ☐ Approved as Amended

Suggested Revisions to the Text of the Regulations:

We recommend approval of this proposal.

Reason:

We agree with the DSA proposal, as this is in harmony with the ADA 2010 standards and eliminates installation conflicts i.e., interference between grab bars and flush valves.

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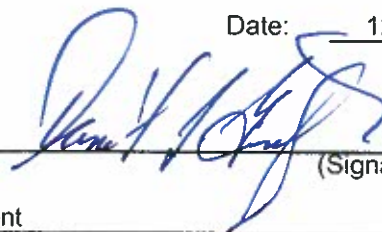
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We do not agree with:

☒ The Agency proposed modifications As Submitted on Section No. 11B-606.7 Sink Depth.

and request that this section or reference provision be recommended:

☐ Approved ☒ Disapproved ☐ Held for Further Study ☐ Approved as Amended

Suggested Revisions to the Text of the Regulations:

We recommend disapproval of this proposal and adoption of the 2010 ADA Standards in efforts of harmonization.

Reason: We disagree with the proposed requirement for sink compartment depth of 6-1/2" max. This requirement was dropped in the ADA and the ICC/ANSI A117.1 on the premise that the knee and toe clearance requirements by default control the maximum depth of the sink compartment.

Adoption of this proposal would significantly reduce the selection of sinks available to the disabled community, that for many years have proven to be perfectly acceptable for accessible installations throughout the country.